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8
9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,)
)
12 Plaintiff,)
)
13 v.) 2:11-CR-453-PMP-(CWH)
)
14 DAVID M. MARK ,)
)
15 Defendant.)

16 **UNITED STATES OF AMERICA’S UNOPPOSED MOTION TO EXTEND TIME TO RESPOND**
17 **TO DEFENDANT DAVID MARK’S OBJECTION TO POST VERDICT ORDER OF**
18 **FORFEITURE AND REQUEST FOR HEARING (ECF NO. 153)**
(First Request)

19 The United States of America (“United States”), by and through Daniel G. Bogden, United States
20 Attorney for the District of Nevada, and Daniel D. Hollingsworth, Assistant United States Attorney
21 (“AUSA”), respectfully moves this Honorable Court for an Order extending the time for the United
22 States to file a Response to Defendant David Mark’s Objection To Post Verdict Order Of Forfeiture and
23 Request for Hearing (ECF No. 153) pursuant to Fed. R. Crim. P. 45(b)(1) and LCR 45-1. The Response
24 is currently due May 3, 2013. Order, ECF No. 154. The United States requests an extension of time to
25 and including May 24, 2013. This is the first request for an extension of time. The grounds for
26 extending the time are as follows.

1 Many pleadings have been filed in numerous criminal cases requiring undersigned counsel to
2 respond, and seven civil cases require immediate attention because of upcoming deadlines recently
3 imposed. Undersigned counsel cannot meet all of the deadlines in these cases and needs an extension of
4 time.

5 On April 29, 2013, undersigned counsel spoke with opposing counsel, Michael S. Fawer, who
6 stated he did not oppose this extension of time and authorized the three week extension.

7 This motion is not submitted solely for the purpose of delay or for any other improper purpose.

8 This Court should grant an extension of time to and including May 24, 2013, pursuant to Fed. R.
9 Crim. P. 45(b)(1) and LCR 45-1, for the United States to file a Response to Defendant David Mark's
10 Objection To Post Verdict Order Of Forfeiture and Request for Hearing (ECF No. 153).

11 DATED this 1st day of May, 2013.

12 DANIEL G. BOGDEN
13 United States Attorney

14 /s/Daniel D. Hollingsworth
15 DANIEL D. HOLLINGSWORTH
16 Assistant United States Attorney

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18 IT IS SO ORDERED:

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21 UNITED STATES DISTRICT JUDGE

22 DATED: May 6, 2013.
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